

Filed

JUN - 5 2008

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

E-FILING

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAE KI EUN,

a/k/a John Kim,
a/k/a Zheshan Jin,
a/k/a Jin Francis Kim
a/k/a Eug Ene Pak,
a/k/a Hyun J. Kim,

Defendant.

~~U.S. CR. 08-00383-JW~~
CR-08 00383 JW

VIOLATION: Title 18, United States Code,
Section 371 - Conspiracy

SAN JOSE VENUE

PVT

INFORMATION

The United States Attorney charges:

1. Beginning in or about April 2007 and continuing through in or about July 2007, the dates being approximate and inclusive, within the Northern District of California and elsewhere,

DAE KI EUN,
a/k/a John Kim,
a/k/a/ Zheshan Jin,
a/ka Jin Francis Kim ,
a/k/a Eug Ene Pak,
a/k/a Hyun J. Kim,

INFORMATION

1 the defendant herein ("EUN"), and others known and unknown, did knowingly combine,
2 conspire, confederate, and agree together and with each other to commit offenses against the
3 United States, that is, to violate Title 18, United States Code, Section 2421, that is, knowingly
4 transporting any individual in interstate and foreign commerce with intent that such individual
5 engage in prostitution, and in any sexual activity for which any person can be charged with a
6 criminal offense.

7 2. It was the gist of the conspiracy that the defendant and other persons would and did
8 arrange for the transportation of women from the Republic of Korea, through Mexico, and into
9 the United States, for the purpose of said women to work as prostitutes in a brothel the defendant
10 operated in the Northern District of California.

11 Overt Acts:

12 3. In furtherance of the conspiracy and to effect its illegal objectives, EUN committed and
13 caused to be committed the following overt acts, among others, in the Northern District of
14 California and elsewhere, all dates being approximate:

15 a) In April 2007, EUN spoke by telephone, utilizing phone number 213-200-8704, to an
16 individual hereinafter referred to as JYP, a female prostitute residing in the Republic of Korea,
17 and agreed to "jump", or provide JYP safe travel, into the United States for purposes of
18 prostitution.

19 b) In June 2007, EUN communicated with JYP, utilizing Korean e-mail account
20 1355hyun@hanmail.net, and provided JYP with the name of an associate and a designated bank
21 account to which JYP was to send a down payment and for airline tickets to the United States
22 from the Republic of Korea. JYP sent the payment as directed by EUN.

23 c) Also in June 2007, EUN made travel arrangements for JYP and two other women by
24 reserving airline tickets in their names for travel from Korea to Tijuana, Mexico.

25 d) In July 2007, EUN made further travel arrangements for JYP. Upon JYP's arrival in
26 Tijuana, one of EUN's associates instructed JYP to hide her real passport and provided her with
27 an apparently valid Korean passport, with United States visa attached, in the name of another
28 person. JYP displayed the passport provided by EUN's associate at the United States border and

INFORMATION

1 was granted entry. EUN also arranged for his associates to drive JYP from Mexico to Los
2 Angeles to meet EUN. JYP thereupon traveled to Los Angeles according to EUN's
3 arrangements.

4 e) Also in July 2007, EUN accepted payment from JYP for arranging to smuggle her into
5 the United States for purposes of prostitution via cash deposited into EUN's Bank of America
6 account.

7 f) In September 2007, EUN employed JYP as a prostitute in a brothel he operated in the
8 Northern District of California.

9 All in violation of Title 18, United States Code, Section 371.

10
11 DATED: 6/5/08

12
13 JOSEPH P. RUSSONIELLO
14 United States Attorney

15
16 MATTHEW A. PARRELLA
17 Chief, San Jose Branch Office

18
19 (Approved as to form: )

20 AUSA THOMAS M. O'CONNELL
21
22
23
24
25
26
27
28

INFORMATION

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURTBY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☐ SUPERSEDING**OFFENSE CHARGED**COUNT ONE: Title 18 United States Code,
Section 371 - Conspiracy☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony**PENALTY:**10 years imprisonment
\$250,000 fine
3 years supervised release
\$100.00 special assessment**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

S/A ALEX KOZBANETS-F.B.I.

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:☐ U.S. Att'y ☐ Defense☐ this prosecution relates to a pending case involving this same defendant☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded underSHOW
DOCKET NO.MAGISTRATE
CASE NO.

Name and Office of Person

Furnishing Information on
THIS FORM

JOSEPH P. RUSSONIELLO

☒ U.S. Att'y ☐ Other U.S. AgencyName of Asst. U.S. Att'y
(if assigned)

THOMAS O'CONNELL

Name of District Court, and/or Judge/Magistrate Location
NORTHERN DISTRICT OF CALIFORNIA

DEFENDANT - U.S.

DAE KI EUN

DISTRICT COURT NUMBER

CR - 08 00383 JW

DEFENDANT

PVT**IS NOT IN CUSTODY**1) ☐ Has not been arrested, pending outcome this proceeding.
If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☒ On this charge5) ☐ On another conviction6) ☐ Awaiting trial on other charges☐ Fed'l ☐ State

If answer to (6) is "Yes", show name of institution

Has detainer
been filed?☐ Yes
☐ NoIf "Yes"
give date
filed**DATE OF
ARREST**

Month/Day/Year

Or... if Arresting Agency & Warrant were not

**DATE TRANSFERRED
TO U.S. CUSTODY**

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address: _____

*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____

Before Judge: _____

Comments: _____